

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 1997**

**DOCKET NO. R97-1**

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**FIRST SET OF INTERROGATORIES OF  
MAGAZINE PUBLISHERS OF AMERICA  
TO USPS WITNESS FRONK  
(MPA/USPS-T32-1-4)**

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(September 17, 1997)

Pursuant to the Commission's Rules of Practice, Magazine Publishers of America hereby submits the attached interrogatories to USPS witness Fronk (MPA/USPS-T32-1-4).

Respectfully submitted,



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James R. Cregan  
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**INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA  
TO UNITED STATES POSTAL SERVICE WITNESS FRONK**

**MPA/USPS-T32-1.** Please refer to Page 5, Lines 14 and 15 of your testimony and explain the basis of the apparent assumption that a business will convert to paying postage costs under PRM if it is not presently enrolled as a Business Reply Mail user.

**MPA/USPS-T32-2.** Please refer to Page 6, Lines 8-10 and provide the Postal Service's estimate for the value of the total cost avoidance and the cost avoidance per piece resulting from the outsourcing of the postage accounting functions.

**MPA/USPS-T32-3.** Please refer to Page 7, Lines 4-6.

- a. Please explain how the "qualification" requirements for Qualified Business Reply Mail will differ from current requirements for BRMAS qualification
- b. Will the focus of the qualification requirements be on the mail piece being automation compatible?
- c. Will the qualification requirements include nonautomation issues (such as printing First Class Mail, rather than First-Class Mail)?

**MPA/USPS-T32-4.** Please refer to Page 7, Lines 18-21. Please provide the Postal Service's estimate of the reply volume that would make the PRM option advantageous financially.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
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James R. Cregan

Washington, D.C.  
September 17, 1997